

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, LUKE LOE, RICHARD ROE,  
and MARY MOE, individually and on behalf  
of all others similarly situated,

*Plaintiffs,*

*v.*

No. 1:18-cv-09936-LGS

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity,  
DONALD TRUMP JR., ERIC TRUMP, and  
IVANKA TRUMP,

*Defendants.*

**NON-DISCLOSURE AGREEMENT**

I, \_\_\_\_\_, on behalf of non-party ACN Opportunity, LLC (“ACN”) acknowledge that I have read and understand the Protective Order in this action governing the non-disclosure of Confidential Discovery Material and Confidential Identity Information (together, “Protected Material”). I agree that (1) I will hold in confidence all Protected Material to the extent required by the Protective Order and agree to be bound by the terms of that Order; (2) I will use such Protected Material only for purposes of this litigation and for no other purpose whatsoever; and (3) I will take all due precautions to prevent the unauthorized or inadvertent disclosure of such Protected Material.

Notwithstanding the foregoing, as reflected by their counter-signatures below, the parties hereby stipulate and agree that nothing in this Non-Disclosure Agreement or the Protective Order in this action shall prevent or limit ACN in any way from exercising its rights and/or pursuing all remedies available to it under its agreement(s), through arbitration or otherwise as required by its agreement(s), with any Defendant and/or any Independent Business Owner, including but not limited to any plaintiff or any putative class member in this action.

By acknowledging these obligations under the Protective Order, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunderenforcement of the Protective Order only, and that my willful violation of any term of the Protective Order could subject me to punishment for contempt of court.

Dated: \_\_\_\_\_

Countersigned as to paragraph 2 above by:

Counsel for Plaintiffs: \_\_\_\_\_

Counsel for Defendants: \_\_\_\_\_